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June 24, 2022

**VIA ECF**

Magistrate Judge Hon. James L. Cott  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

**Re: *Free Holdings Inc. v. Kevin McCoy & Sotheby's Inc.*, Case No. 1:22-cv-00881-JLC; Extension of Page Limit for Motion to Dismiss Memorandum of Law**

Dear Judge Cott:

We represent defendant Kevin McCoy in the above-referenced action. McCoy's response to Plaintiff's Amended Complaint is due on June 30, 2022. McCoy anticipates filing a motion to dismiss all claims (there are six causes of action alleged, including for declaratory judgment, unjust enrichment, slander of title, N.Y. GBL § 349, commercial disparagement, and Section 43(a) of the Lanham Act, 15 U.S.C. § 1125(a)). We respectfully submit this letter-motion pursuant to Your Honor's Individual Rule II.E to request that McCoy be granted a 5-page extension for his supporting memorandum of law (*i.e.*, from 25 pages to 30 pages). Plaintiff and co-defendant Sotheby's both consent to this request.

We thank the Court for its consideration.

Respectfully submitted,

William L. Charron

cc: All counsel (via ECF)